

REMARKS

It is believed that the above amendments and following remarks attend to each and every rejection and objection presented in the pending April 6, 2005 office action. Claims 1-17 remain pending, with claims 1, 5, 7, 10, 13 and 17 being independent.

Specification

Paragraph [0001] is amended to insert information of related applications without new matter. Reconsideration is requested.

Claim Rejections – 35 U.S.C. §103

Claims 1-17 stand rejected under 35 U.S.C. §103(a) as being unpatentable over US Publication number US2003/0221173 (hereinafter "Fisher"). Respectfully, we disagree.

To establish a *prima facie* case of obviousness, three basic criteria must be met.

First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or to combine reference teachings.

Second, there must be a reasonable expectation of success.

Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on Applicant's disclosure. MPEP § 2143, *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991)

Fisher fails to disclose each and every element of the method claims 1-17, and therefore fails to render these claims obvious under 35 U.S.C. §103 because Fisher reaches a similar endpoint through a different method.

Consider what happens when a particular "parent" hierarchical block of a design is being processed.

Claim 1 of the present application has the elements "for each port instance on said each block instance, wherein the port instance is not connected to a net in a parent block, generating a warning indicating the name of the port instance that is not connected; and for each port, . . . that is not connected to a net within the block, generating a warning indicating the name of the port that is not connected."

These claim elements describe a method where a list of blocks in the parent block is processed, **for each block of the list, a list of ports on the block is processed**, and ports not connected to nets are reported.

In contrast, when Fisher enters a hierarchical block (he uses the term "non-leaf cell" to represent a block) at Fisher 56 (Fisher Fig. 3) he begins by making a list of NETS in the block. He then loops through the list of nets (Fisher 57), **analyzing each NET for connectivity errors** such as having no driver on the net.

Fisher therefore reaches his result by processing NETS, while Applicant processes BLOCKS and PORTS to reach a similar result. A net is not a port!

Applicant's method has advantages when a block has a port not connected to any net. In this case, Fisher would have to assign a dummy net to the port, so as to detect the "open" by analyzing the dummy net. No dummy nets are necessary with Applicant's method, since an unconnected port is by definition an error.

Since Fisher fails to disclose key elements of the method, the Examiner has failed to meet his burden for a 35 U.S.C. 103 rejection.

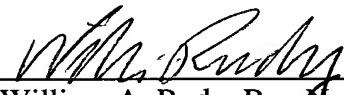
These arguments are of course applicable for all claims 1-17.

Conclusion:

In view of the above arguments, we respectfully request reconsideration.

It is believed that no fees are due in connection with this amendment. If any additional fee is due, please charge Deposit Account No. 08-2025.

Respectfully submitted,

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